

# **EXHIBIT B**

**From:** [Frank Hedin](#)  
**To:** [Tayman, Kyle](#)  
**Cc:** [Abbas Kazerounian](#); [Jason Ibey](#); [Pamela Prescott](#); [dhall@hedinhall.com](#); [Nicholas Barthel](#); [jmorganroth@morganrothlaw.com](#); [Brown, Brooks R](#); [Hendriksen, Patrice E](#)  
**Subject:** Re: Activity in Case 5:19-cv-00163-FMO-SP Amanda Hill v. Quicken Loans Inc. Minutes of In Chambers Order/Directive - no proceeding held  
**Date:** Wednesday, April 1, 2020 1:25:07 PM  
**Attachments:** [image001.png](#)

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Kyle,

Confirming our agreement that neither our expert nor your rebuttal expert will discuss best practices.

Frank S. Hedin



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On Apr 1, 2020, at 8:47 AM, Tayman, Kyle <[KTayman@goodwinlaw.com](mailto:KTayman@goodwinlaw.com)> wrote:

Counsel,

Following-up on my email below, please let us know plaintiffs' position.

Best,  
Kyle

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**From:** Tayman, Kyle

**Sent:** Friday, March 27, 2020 5:18 PM

**To:** Frank Hedin <[fhedin@hedinhall.com](mailto:fhedin@hedinhall.com)>; Abbas Kazerounian <[ak@kazlg.com](mailto:ak@kazlg.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Pamela Prescott <[pamela@kazlg.com](mailto:pamela@kazlg.com)>; [dhall@hedinhall.com](mailto:dhall@hedinhall.com); Nicholas Barthel <[nicholas@kazlg.com](mailto:nicholas@kazlg.com)>

**Cc:** [jmorganroth@morganrothlaw.com](mailto:jmorganroth@morganrothlaw.com); Brown, Brooks R <[BBrown@goodwinlaw.com](mailto:BBrown@goodwinlaw.com)>; Hendriksen, Patrice E <[PHendriksen@goodwinlaw.com](mailto:PHendriksen@goodwinlaw.com)>

**Subject:** RE: Activity in Case 5:19-cv-00163-FMO-SP Amanda Hill v. Quicken Loans Inc. Minutes of In Chambers Order/Directive - no proceeding held

Counsel,

In light of the Court's order for the parties to simultaneously submit direct testimony by declaration on April 7, I am writing to confirm the agreement reached at the February 28 evidentiary hearing regarding the direct testimony of Mr. Young.

That agreement was that Plaintiffs will not put forth direct testimony from Mr. Young concerning "best practices" - that is, the section of his report beginning on page 9 titled "Best practice with regards to confirming a site visitor has consented to terms" - as Quicken Loans otherwise objects to that line of testimony on relevancy grounds. Please confirm by close of business on Monday that the parties remain in agreement and that Mr. Young's declaration will not include the "best practices" testimony.

I hope that everyone is well and healthy. Enjoy the weekend.

Best,  
Kyle

**W. Kyle Tayman**

Partner

<image002.png>

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[KTayman@goodwinlaw.com](mailto:KTayman@goodwinlaw.com) | [goodwinlaw.com](http://goodwinlaw.com) <image004.png>

<image006.png> <image008.png>

**From:** [cacd\\_ecfmail@cacd.uscourts.gov](mailto:cacd_ecfmail@cacd.uscourts.gov) <[cacd\\_ecfmail@cacd.uscourts.gov](mailto:cacd_ecfmail@cacd.uscourts.gov)>

**Sent:** Wednesday, March 25, 2020 3:39 PM

**To:** [ecfnef@cacd.uscourts.gov](mailto:ecfnef@cacd.uscourts.gov)

**Subject:** Activity in Case 5:19-cv-00163-FMO-SP Amanda Hill v. Quicken Loans Inc.  
Minutes of In Chambers Order/Directive - no proceeding held

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

## Notice of Electronic Filing

The following transaction was entered on 3/25/2020 at 12:38 PM PDT and filed on 3/24/2020

**Case Name:** Amanda Hill v. Quicken Loans Inc.

**Case Number:** [5:19-cv-00163-FMO-SP](https://ecf.cacd.uscourts.gov/casenet/cases/5:19-cv-00163-FMO-SP)

**Filer:**

**Document Number:** [92](#)

**Docket Text:**

**MINUTE ORDER IN CHAMBERS by Judge Fernando M. Olguin: Order  
Re: Further Proceedings, re: Stipulation for Hearing [91]. (twdb)**

**5:19-cv-00163-FMO-SP Notice has been electronically mailed to:**

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